

STANDARD

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

)	
)	Case No.
Plaintiff(s),)	
)	Judge Pamela A. Barker
v.)	
)	<u>REPORT OF PARTIES' PLANNING</u>
)	<u>MEETING UNDER FED. R. CIV.</u>
)	<u>P. 26(f) AND LR 16.3(b)(3)</u>
Defendant(s).)	
)	

1. Pursuant to Fed. R. Civ. P. 26(f) and LR 16.3(b)(3), a meeting was held on _____
June 20, 2025, and was attended by:
Brian D. Bardwell counsel for plaintiff(s) _____
_____ counsel for plaintiff(s) _____
Michael Ockerman counsel for defendant(s) _____
Emily Yoder counsel for defendant(s) _____

2. The parties:
_____ have exchanged the pre-discovery disclosures required by Fed. R. Civ. P. 26(a)(1) and the
Court's prior order;
x will exchange such disclosures by within seven days of the Court's ruling on the Defendants'
motion to stay

_____ have not been required to make initial disclosures.

3. The parties recommend the following track:

_____Expedited x Standard _____Complex
_____Administrative _____Mass Tort

4. This case is suitable for one or more of the following Alternative Dispute Resolution (“ADR”) mechanisms:

_____Early Neutral Evaluation x Mediation _____Arbitration
_____Summary Jury Trial _____Summary Bench Trial
_____Case not suitable for ADR

5. The parties _____do/ x do not consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

6. Electronically Stored Information. The Parties: **(indicate one):**

_____ agree that there will be no discovery of electronically-stored information; or
_____ have agreed to a method for conducting discovery of electronically-stored information;
or
 x have agreed to follow the default standard for discovery of electronically-stored information (Appendix K to Northern District of Ohio Local Rules).

7. Recommended Discovery Plan:

(a) Describe the subjects on which discovery is to be sought and the nature and extent of discovery.

The parties have already exchanged some discovery in the state court. Defendants plan to move for a stay of discovery. Plaintiffs expect to need only limited additional discovery with respect to the new claim in the federal complaint and a small number of issues that were still outstanding when the state court case was dismissed.

(b) Discovery cut-off date: December 17, 2025

8. Recommended dispositive motion date: March 30, 2026

9. Recommended expert discovery date: May 1, 2026

Expert report(s) by party initially seeking to introduce expert testimony

recommended due date January 5, 2026

Responsive expert report(s) due date: March 9, 2026

10. Recommended cut-off date for amending the pleadings and/or adding additional parties: December 15, 2025

11. Recommended date for Status Hearing: January 12, 2026

12. Other matters for the attention of the Court: The parties will discuss the need for a protective order governing the disclosure of medical and financial records.

Attorney for Plaintiff(s) s/Brian D. Bardwell

Attorney for Plaintiff(s) _____

Attorney for Defendant(s) s/Emily Yoder (by consent)

Attorney for Defendant(s) _____